

In Re Patent Application of:
CLARKE ET AL.
Serial No. 10/787,515
Filing Date: **FEBRUARY 26, 2004**

REMARKS

The Examiner is thanked for the thorough examination of the present application. Independent Claims 1, 9, 14, and 17 have been amended to incorporate the subject matter of their respective dependent Claims 6, 12, 15, and 20, which have been cancelled. No new matter is being added.

In view of the amendments and the arguments presented in detail below, it is submitted that all of the claims are patentable.

I. The Claimed Invention

The present invention is directed to a communications system. As recited in amended independent Claim 1, for example, the system includes a plurality of account databases each for storing information associated with different accounts. A central database is for storing location information associating each account with a respective account database, and also for storing shared system setup information. The system further includes at least one communications device for accessing account information and an interface device. In particular, the interface device is for receiving an account access request from the at least one communications device for a desired account. Moreover, the interface device is also for retrieving account location information from the central database for the desired account, and interfacing the at least one communications device with the respective account database associated with the desired account

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based thereon. Additionally, the interface device is also for caching the account location information and using the cached account location information for subsequently interfacing the at least one communications device with the respective account database. Also, the interface device also retrieves and caches the shared system setup information for use in interfacing the at least one communications device with the respective account database.

Independent Claim 9 is directed to a similar interface device. Furthermore, independent Claim 14 is directed to a related method, and independent Claim 17 is directed to a related computer-readable medium.

II. The Claims Are Patentable

As noted above, independent Claims 1, 9, 14, and 17 have been amended to incorporate the subject matter of their respective dependent Claims 6, 12, 15, and 20. The Examiner rejected Claims 6, 12, 15, and 20 under 35 U.S.C. §103(a) based upon U.S. Patent No. 5,978,577 to Rierdon et al. in further view of U.S. Patent No. 5,560,005 to Hoover et al. Rierdon et al. discloses a subscriber management system that includes at least one Data Directory Server (DDS) located between one or more transaction generators and one or more data servers. The DDS routes transactions and provides data location functions. Based upon internal rules within the DDS and the particular transaction type, the DDS routes transactions to the appropriate server(s).

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Transactions are classified according to where they may be executed. Specifically, transactions may be classified as SPECIFIC, ANY or ALL. A SPECIFIC transaction must be processed at one or more specific servers irrespective of the accompanying arguments. An ANY transaction may be processed at any of the enterprise servers and selection is made randomly. Finally, an ALL transaction requires sequencing through each of the data servers within the enterprise and repetitively performing the transaction. See, e.g., col. 4, lines 11-28 of Rierdon et al.

The Examiner correctly acknowledges that Rierdon et al. fails to teach or fairly suggest the central database storing shared system setup information, and retrieving the caching the shared system setup information for use in interfacing a communications device(s) with a respective account database, as recited in original Claims 6, 12, 15, and 20. Nonetheless, the Examiner contends that Hoover et al. provides this noted deficiency.

Hoover et al. discloses an object-based relational distributed database system and associated methods of operation that transforms data stored in a plurality of remote, heterogeneous user databases into a homogeneous data model. Data stored in distributed, heterogeneous user database structures is homogenized by mapping into object attributes of predetermined instances of objects forming to a conceptual model that relates the various heterogeneous databases. The object attributes are stored in remote databases at client sites, which can be separate

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computer systems from the heterogeneous user databases or separate processes running on a computer system that maintains the heterogeneous user databases. The system stores location information and status information relating to the homogenized data in a centralized object broker for object management, thereby facilitating location and retrieval of data items from one or more of the remote, heterogeneous user databases. See, e.g., col. 5, line 35 through col. 6, line 56 of Hoover et al.

It is respectfully submitted that the Examiner mischaracterizes the teachings of the prior art, and that the proposed combination of references therefore fails to teach or fairly suggest all of the recitations of the above-noted independent claims as amended. The Examiner contends that the object attribute tables (OATs) discussed at col. 22, lines 23-49 of Hoover et al. are somehow equivalent to the shared system setup information stored in the central database, and that Hoover et al. therefore provides retrieving the caching the shared system setup information for use in interfacing a communications device(s) with a respective account database. This passage is quoted below for convenience of reference:

"By way of example, consider in FIG. 6 the user computer site **12a**, denominated user computer **1**, which is associated with remote database RDB **1** (shown at **28a** in FIG. 1). Each user computer **12** maintains a plurality of object attribute tables (OAT) **140a**, **140b** . . . **140n**. Each user computer **12** also stores and maintains object attribute

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table (OAT) indexes **150a, 150b . . . 150n.** for each corresponding object attribute table **140**. Each object attribute table **140** relates predetermined objects and attributes of objects to predetermined data fields or data items stored in the customer databases. These attributes are also part of the homogeneous data model and must be converted by an interface to the customer specific native format. The specific procedure for this transformation will be discussed in greater detail below in connection with the PERSON PUT operation, which is utilized to introduce data from a heterogeneous database into the homogeneous data model.

It will be recalled from the discussion of FIG. 1 that the customer databases such as **26** and the remote databases such as **28** are not necessarily in the same format and may be heterogeneous. The function of the object attribute tables **140** in FIG. 6 is to maintain a one-to-one relationship between selected fields or data items in a given customer database **26**, to selected objects and attributes of objects within the object model that is effected by the present invention. Further details of the structure of the object attribute tables **140** are described in greater detail below."

As an initial matter, this passages teaches that OATs are stored on individual computers, not on a centralized database. Moreover, as seen in the exemplary OATs shown in FIGS. 8 and 9 of Hoover et al., these are merely database tables that relate individual record sets (i.e., user name, birthday, martial status, etc.) in lower level tables with corresponding primary or foreign database keys in upper level index tables. While Hoover

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does teach storing status and location information, nowhere does this reference teach or fairly suggest storing shared system setup information that is used by clients to access corresponding databases.

Accordingly, since the remaining prior art of record fails to teach or fairly suggest the above-noted deficiencies, it is submitted that independent Claims 1, 9, 14, and 17 as amended are patentable over the prior art. Their respective dependent claims, which recite yet further distinguishing features, are also patentable over the prior art and require no further discussion herein. To find otherwise would require the impermissible use of the claimed invention, in hindsight, as a roadmap or template to piece together the teachings of the prior art.

CONCLUSION

In view of the amendments to the claims and the arguments provided herein, it is submitted that all the claims are patentable. Accordingly, a Notice of Allowance is requested in due course. Should any minor informalities need to be addressed, the Examiner is encouraged to contact the undersigned attorney at the telephone number listed below.

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Respectfully submitted,

A handwritten signature in dark ink, appearing to read "John F. Woodson, II". The signature is fluid and cursive, with a large, stylized initial "J" and a distinct "II" at the end.

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